

where necessary and reasonable, as is common with members of this bar, and, in fact, had already extended Ms. Andrews's deadline to respond to the November 9 discovery until March 9 – four months after it was initially served.² Tri Star could not agree to extend Ms. Andrews's deadline even further in order to get its own extension. As a result, Tri Star has filed this Motion.

For these reasons, Tri Star respectfully requests that its time to respond to the Second Set of Requests for Production, Requests for Admission, and Interrogatories be extended by sixteen days, until March 31, 2022. This short extension will not unduly delay this litigation and will not affect any of the deadlines currently in place.

Respectfully Submitted,

/s/ Elizabeth G. Hart
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*Attorneys for Tri Star Sports &
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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Plaintiff in an effort to resolve this dispute without court action, but those efforts were unsuccessful as Plaintiff's counsel objected to the requested extension.

/s/ Elizabeth G. Hart
Elizabeth G. Hart

² Notably, March 9 has now passed and Ms. Andrews still has not provided complete discovery responses, though the deadline has not been extended by agreement or by this Court.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served via the Court's Electronic Filing System on:

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on this 10th day of March 2022.

/s/ Elizabeth G. Hart
Elizabeth G. Hart